

CHARLES LABELLA
Deputy Chief
THOMAS B. W. HALL
ALISON ANDERSON
Trial Attorneys
Fraud Section, Criminal Division
U.S. Department of Justice
1400 New York Avenue, NW
Washington, DC 20530
(202) 616-1682

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA,)	
)	CASE NO. 2:13-cr-00018-JCM-GWF
)	
Plaintiff,)	
)	
v.)	STIPULATION TO CONTINUE PRE-
)	SENTENCE REPORT DUE DATE
CHARLES MCCHESENEY,)	(SECOND REQUEST)
)	
Defendant.)	

IT IS HEREBY STIPULATED AND AGREED by and between THOMAS B.W. HALL, and DOUGLASS MITCHELL, ESQ., counsel for defendant Charles McChesney, that the Probation Office's Pre-Sentence Report ("PSR") current deadline (June 22, 2015) be extended four days, to June 26, 2015. This is the second request to extend the time for disclosing the PSR.

This Stipulation is entered into for the following reasons:

1. On January 27, 2015, Defendant Charles McChesney entered a plea of guilty to the wire fraud and conspiracy to commit wire and mail fraud charges against him.
2. Defendant McChesney's sentencing is set for July 20, 2015. Initially, McChesney's PSR was due to counsel for the Government and defense counsel on June 15, 2015.

3. On June 12, 2015, the Government and McChesney stipulated to extend the time for the Department of Parole & Probation to disclose the PSR from June 15, 2015 to June 22, 2015. The parties requested the extension in order to give them an opportunity to consider the Court's decisions following the June 15, 2015 evidentiary hearing regarding the amount of loss in this matter and the June 17, 2015 sentencing hearings for defendants Keith Gregory, Salvatore Ruvolo, David Ball, and Edith Gillespie.

4. The Government and McChesney now ask the Court to extend the deadline for the Department of Parole & Probation to disclose the PSR from June 22, 2015 to June 26, 2015. The additional time will provide the parties an opportunity to continue discussing certain sentencing issues.

5. Counsel for McChesney has spoken with Ms. Sandi Schmidt of the Probation Office, and she is in agreement with the parties' stipulation.

DATED this 22nd day of June, 2015.

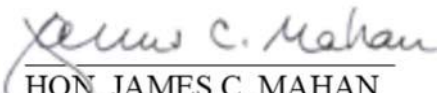
Respectfully submitted,

/s/ Thomas B.W. Hall
THOMAS B.W. HALL
Trial Attorney

/s/ Douglass Mitchell
DOUGLASS MITCHELL
Counsel for Defendant Charles McChesney

DATED June 19, 2015.

IT IS SO ORDERED.


HON. JAMES C. MAHAN
UNITED STATES DISTRICT JUDGE

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA,)	
)	CASE NO. 2:13-cr-00018-JCM-GWF
Plaintiff,)	
)	
v.)	CERTIFICATE OF SERVICE
)	
CHARLES MCCHESENEY,)	
)	
Defendant.)	

I, the undersigned, hereby certify that this pleading was filed with the clerk of court via ECF and will be served electronically via ECF on all parties that have entered their appearances in this case.

Dated: June 12, 2015

Respectfully submitted,

/s/ Douglass A. Mitchell
Douglass A. Mitchell
Attorney for Charles McChesney